

LAW OFFICE OF



TARA DAWN SHURLING, PA

Attorney and Counselor at Law

3614 Landmark Drive

Suite A

Columbia, South Carolina 29204

(803) 738-8622

(Fax) (803) 738-1600

E-Mail: tdslaw@shurlinglaw.com

May 27, 2015

The Honorable Daniel E. Shearouse
Clerk, Supreme Court of South Carolina
P.O. Box 11330
Columbia, SC 29211

RECEIVED

MAY 29 2015

S.C. SUPREME COURT

Re: Kevin Bradley, 339031 v. State of South Carolina;
Appellate Case No. 2015-000136.

Dear Mr. Shearouse:

Enclosed for filing please find the Petitioner's Motion for Extension of Time and my Certificate of Service in the above-captioned case. I would appreciate your clocking and returning the extra copy enclosed in the envelope provided. Thank you for your assistance in this matter. I remain,

Sincerely yours,

A large, stylized handwritten signature in black ink that reads "Tara Dawn Shurling".

Tara Dawn Shurling
Attorney and Counselor at Law

TDS/sm
Enclosures

cc: Daniel Gourley, Assistant Attorney General (w/enclosures)
Kevin Bradley, 339031 (w/enclosures)

STATE OF SOUTH CAROLINA
In The Supreme Court

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

RECEIVED

R. Ferrell Cothran, Jr., Circuit Court Judge

MAY 29 2015

Appellate Case No. 2015-000136

S.C. SUPREME COURT

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

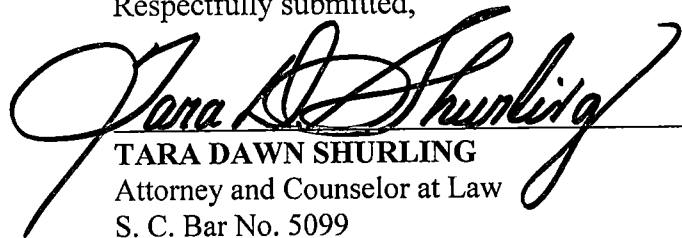
**PETITIONER'S MOTION
FOR EXTENSION OF TIME**

THIS MATTER comes before the Court by way of an appeal from a Post-Conviction Relief Order. The Petition for Writ of Certiorari is due for filing on today's date. Yesterday I had a Reply to State's Return to Petition for Writ of Certiorari due in this Honorable Court, I have two federal habeas petitions due in the U.S. District Court this week. Next week, I have a proposed order due to a circuit court judge, as well as an Initial Brief of Respondent due in the South Carolina Court of Appeals. Because of these matters, I have been unable to complete my final draft on this Petition on today's date. I had hoped that I would be able to file this Petition today, but because my other scheduled obligations took longer than I anticipated I will not be able to complete my final draft of this Petition today. I now respectfully request a thirty (30) day extension of time in which to prepare and submit my Petition for Writ of Certiorari on behalf of this client. I hope to be able to complete

this petition in less than thirty (30) days; however, I am requesting thirty (30) days to avoid any need for a further extension.

Since this is my fourth extension request, opposing counsel, Daniel Gourley, Assistant Attorney General has consented to this extension by his signature below. (In compliance with *In Re: Extensions in Criminal and Post-Conviction Relief Cases*, S. C. Sup. Ct. Order dated March 18, 2009) (Davis Adv. Sh. No. 13 at 1). I no longer have an associate in my law firm, and therefore can not have another lawyer in my firm certify the necessity of the extension. I appreciate the Court's consideration in this matter and do not anticipate any further extension requests for this stage of this PCR appeal.

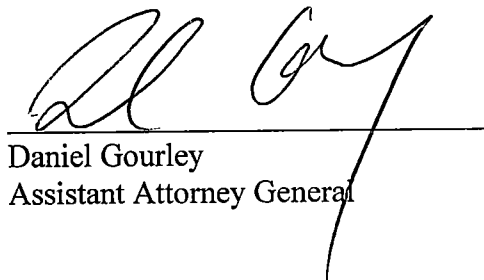
Respectfully submitted,


TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER

This 27th day of May, 2015.

I Consent:


Daniel Gourley
Assistant Attorney General

STATE OF SOUTH CAROLINA
In The Supreme Court

RECEIVED

APPEAL FROM WILLIAMSBURG COUNTY
Court of Common Pleas

MAY 29 2015

R. Ferrell Cothran, Jr., Circuit Court Judge

S.C. SUPREME COURT

Appellate Case No. 2015-000136

KEVIN C. BRADLEY, 339031,

PETITIONER,

v.

STATE OF SOUTH CAROLINA,

RESPONDENT.

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the Petitioner's Motion for Extension of Time in the above-entitled case has been served upon opposing counsel this the 27th day of May, 2015, by mailing one (1) copy in a stamped envelope properly addressed to:

Daniel Gourley
Assistant Attorney General
Office of the Attorney General
P. O. Box 11549
Columbia, SC 29211



TARA DAWN SHURLING
Attorney and Counselor at Law
S. C. Bar No. 5099

ATTORNEY FOR PETITIONER.

SWORN TO BEFORE me this 27th day
of May, 2015.

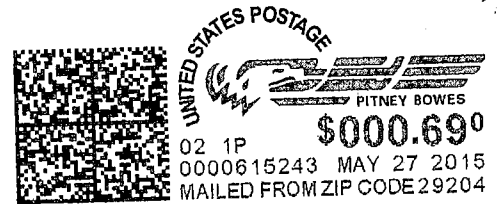
Sharon H. McColister (L.S.)

Notary Public for South Carolina

My Commission Expires: Jan. 16, 2017



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Tara Dawn Shurling, P.A.
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RE: Kevin Bradley